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7 Attorneys for Defendant,  
8 COUNTY OF SACRAMENTO  
9 (erroneously sued herein as "Sacramento County  
9 Sheriff's Department")

10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

13 YAPHETTE GEIGER; JETHRO GEIGER;      }      No. 2:22-cv-0043 JAM DB  
14 K.S., a minor, by and through their Guardian,      }  
15 BRANDIE SMITH; K.G., a minor, by and      }  
16 through their Guardian, BRANDI SMITH; and      }  
17 N.G., a minor, by and through their Guardian,      }  
18 ASIA LEE HERON; and JW GEIGER      }  
19 Plaintiffs      }  
20 v.      }  
21 COUNTY OF SACRAMENTO,      }  
22 SACRAMENTO COUNTY SHERIFF'S      }  
23 DEPARTMENT and DOES 1 through 100,      }  
24 inclusive,      }  
25 Defendants.      }

26 Plaintiffs Yaphette Geiger; Jethro Geiger; K.S. Geiger; K.S., by and through their  
27 Guardian Brandi Smith; K.G., by and through their Guardian Brandi Smith; N.G., by and  
28 through their Guardian Asia Lee Heron, and J.W. Geiger (herein after "Plaintiffs") and  
Defendant County of Sacramento (herein after "Defendant"), by and through their counsel of  
record (collectively "Parties"), hereby stipulate and request the Court enter an order compelling  
the depositions of Plaintiffs.

Defendant has been diligently attempting to set the depositions of the Plaintiffs since April of 2023. Due to difficulties in obtaining these depositions, the parties sought the Court's assistance by way of an informal discovery conference on October 25, 2023. Defendant also filed a motion to compel the depositions, which is scheduled to be heard on November 17, 2023. The Parties agree that Plaintiffs' depositions are vital to the case and that Defendant is entitled to obtain their testimony. Based on the foregoing, the Parties hereby stipulate to an Order compelling the attendance of Plaintiffs for deposition. After conferring, the Parties agree that Plaintiffs should be required to appear for their depositions on November 8, 2023, and November 10, 2023, and seek an Order so stating. The Parties agree that the depositions will be conducted remotely through Zoom and as follows:

- November 8, 2023 at 9:00 a.m. – Deposition of Yaphette Geiger
- November 8, 2023 at 11:00 a.m. – Deposition of Jethro Geiger
- November 8, 2023 at 1:00 p.m. – Deposition of Brandi Smith
- November 10, 2023 at 10:00 a.m. – Deposition of Asia Heron
- November 10, 2023 at 1:00 p.m. – Deposition of JW Geiger

Dated: October 25, 2023

## LONGYEAR & LAVRA, LLP

By: /s/ Nicole M. Cahill

VAN LONGYEAR  
NICOLE M. CAHILL  
DENNY YU  
Attorneys for Defendant,  
COUNTY OF SACRAMENTO

Dated: October 25, 2023

## MOSLEY & ASSOCIATES

By: /s/ Nathalie Meza Contreras [as authorized 10-25-23]

Walter Mosley, Esq.  
Carlos E. Montoya, Esq.  
Nathalie Meza Contreras, Esq.  
Attorneys for Plaintiffs

## ORDER

Pursuant to the stipulation of the Parties, Plaintiffs are hereby ORDERED to appear for deposition, remotely via Zoom as follows:

- November 8, 2023 at 9:00 a.m. – Deposition of Yaphette Geiger
- November 8, 2023 at 11:00 a.m. – Deposition of Jethro Geiger
- November 8, 2023 at 1:00 p.m. – Deposition of Brandi Smith
- November 10, 2023 at 3:00 p.m. – Deposition of Asia Heron
- November 10, 2023 at 10:00 a.m. – Deposition of JW Geiger

Plaintiffs are cautioned that failure to abide by this Order may result in sanctions, up to and including terminating sanctions, pursuant to Federal Rule of Civil Procedure 37(b)(2)(A).

IT IS SO ORDERED.

DATED: October 26, 2023

/s/ DEBORAH BARNES  
UNITED STATES MAGISTRATE JUDGE